

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

| | | |
|------------------------------------------|---|--------------------------|
| CARPENTERS FRINGE BENEFIT |) | |
| FUNDS OF ILLINOIS and |) | |
| DAVID BRATEK, as Administrator, |) | |
| |) | CIVIL ACTION |
| Plaintiffs, |) | |
| |) | NO. 20 C 3701 |
| vs. |) | |
| |) | JUDGE JOHN J. THARP, JR. |
| SWANSON PROFESSIONAL FLOOR |) | |
| COVERING, INC., an Illinois corporation, |) | |
| |) | |
| Defendant. |) | |

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, SWANSON PROFESSIONAL FLOOR COVERING, INC., an Illinois corporation, in the total amount of \$37,059.91, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,243.81.

On July 30, 2020, the Summons and Complaint was served on the corporation's Secretary, Joshua Swanson by tendering a copy of said documents to him personally (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on August 20, 2020. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon

Cecilia M. Scanlon
Attorney for Plaintiffs
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CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 3rd day of September 2020:

Mr. Paul M. Nagovan, Registered Agent
for Swanson Professional Floor Covering, Inc.
1511 46th Avenue, Suite 1A
Moline, IL 61265-7099

Mr. Joshua Swanson, Secretary
Swanson Professional Floor Covering, Inc.
3103 15th Street
Moline, IL 61265-6005

/s/ Cecilia M. Scanlon _____

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